

**FILED****UNITED STATES DISTRICT COURT**

for the  
 Middle District of Tennessee  
 Civil Division

2021 DEC 20 PM 1:56

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TN

Francis Keisler

Case No.

**03-21 0937**

(to be filled in by the Clerk's Office)

Jury Trial: (check one)  Yes  No**Plaintiff(s)**

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Metro Nashville -v- police department  
 Metro Sheriff department  
 Officer person Metro Nashville  
 provide department

**Defendant(s)**

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**

(Non-Prisoner Complaint)

**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

## I. The Parties to This Complaint

### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

Mefion Francois Keister  
 P.O. Box 17142  
 Nashville TN 37217  
 City State Zip Code  
 Davidson County  
 262-7174588  
 Francois.Keister+700@com

### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Metro Nashville police Department  
 600 Murfreesboro pike  
 Nashville TN 37210  
 City State Zip Code  
 Davidson County  
 615- 862-7400

Individual capacity  Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Metro Davidson county Sheriff  
 Department  
 Nashville TN 37201  
 City State Zip Code  
 Davidson County  
 615- 862-8170

Individual capacity  Official capacity

## Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Officer person

Metro Nashville police OFFICER  
501 Harding place

Nashville TN 37211

City

State

Zip Code

Davidson county county

615-862-7744

 Individual capacity Official capacity

## Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

General sessions court For

Davidson County Nashville, TN

408 2nd Avenue North

Nashville TN 37219

City

State

Zip Code

Davidson county

615-862-5222

 Individual capacity Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

## A. Are you bringing suit against (check all that apply):

 Federal officials (a *Bivens* claim) State or local officials (a § 1983 claim)

## B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

42 U.S.C 1981 of the equal protection clause  
 14th Amendment of the U.S. Constitution  
 and 42 U.S.C 1983, 42 U.S.C. 1988 and U.S.C 18242  
 TN Code 29-11-107 - TN Code 28-3-104 TN Code 28

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
(S) EZekiel OO Individual capacity

4112 Philian Parkway Antioch, TN 37013

Davidson County

(6) METRO Nashville Memorial Library System  
5260 Hickory Hollow Parkway  
Antioch, TN 37013 Official capacity  
Davidson County.

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

*Each defendant acted in violation of Plaintiff's civil rights under both 42 U.S.C. § 1983 and 42 U.S.C. 1983 with other state laws including civil conspiracy, malicious prosecution and violation of Plaintiff's state law of equal protection under the law.*

**III. Statement of Claim**

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

*4112 Philhell Parkway Antioch Tennessee  
Estorbridge et Antioch Tennessee*

B. What date and approximate time did the events giving rise to your claim(s) occur?

*10/19/2021  
10/23/2021*

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?

*Was anyone else involved? Who else saw what happened?) On the 19th of October of 2021 I was arrested from a resident at 4112 Philhell Parkway in Antioch by the Antioch County Sheriff Department in violation of my civil rights. The action was in violation of the Fourteenth Amendment of the equal protection under the law. On the 23rd of October of 2021 my vehicle was towed by a Metro Nashville police officer in violation of my civil rights and the Fourteenth Amendment of the equal protection under the law.*

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE  
DISTRICT OF TENNESSEE

(IN) STATEMENT OF CLAIM

ON THE 10TH OF OCTOBER OF 2021 UPON MY RETURN BACK FROM  
A BOB APPRAISAL I MET ONE OF MY BELONGS ON THE CAFE SIDE OF  
4112 Philian Parkway in Antioch, Tennessee 37013. THIS IS DUE TO  
AN ACTION TAKEN BY THE LANDLORD MR. CO SOMETIME IN JULY OR  
THE GENERAL SESSIONS COURT FOR DAVIDSON COUNTY NASHVILLE, TN.  
SOMETHING IN JULY ABOUT TWO DIFFERENT OCCASIONS UPON MY  
RETURNED FROM MY ARMED SECURITY LICENSE TRAINING I RECEIVED  
ON 11 ASKING ME TO CALL A CERTAIN OFFICER AT THE CITY HALL  
DIVISION. AFTER NO RESPONSE FROM ME THOSE STICKERS READ COMING  
ELECTION WAS POSTED SOMETIME IN AUGUST A NOTICE OF  
ME THE TENANT ON THE MAIN ENTRANCE TO THE HOME NAMING.  
THE SHERIFFS I SHOULDN'T HAVE BEEN ENACTED FROM THE  
SERVED WITH COMES FOR THE ACTUAL ELECTION SINCE I HAD  
A CITY CASE ANY SUMMISHE OR A COMPLAINT NAMING ME  
ON THE 19TH OF OCTOBER OF 2021 THREE OFFICERS CAME TO THE DOOR.  
BROKE INTO MY HOME WHILE I WAS NOT AT HOME AND  
OUTSIDE TO THE CAFE SIDE THE LANDLORD AND TOOK IN MY DOOR  
THE SHERIFFS AND THE CHARGE. THIS ACTION WAS IN VIOLATION  
OF THE CONSTITUTIONAL AND GENERAL SESSIONS BY THE LANDLORD  
STATE LAWS OF DUE PROCESS, WITH OTHERS VIOLATED BY  
CIVIL RIGHTS OF 42 U.S.C. 1983, 42 U.S.C. 1981 AND OTHER VIOLATED  
INCLUDING CIVIL CONSPIRACY, MURKIN PROSECUTION, AND STATE LAWS  
(C) THE UNDERLYING FAIR ARE THAT THE ELECTION WAS IN VIOLATION  
OF MY CONSTITUTION AND BEEN ENACTED BY FROM THE HOME CAFE  
THE FORMERLY PAYS AND SUFFERS WHICH WAS OF DIRECT CAUSE  
BY THE THREE DEFENDANT THE LANDLORD, THE SHERIFF AND  
GENERAL SESSIONS COURT I WAS NOT SERVED WITH A SUMMISHE  
HEITHER WAS A COMPLAINT BEEN PROPERLY NOTICED OR MADE SO THE  
ELECTION ITSELF WAS VIOLATED BY ALL MEANS, IN VIOLATION OF  
MY EIGHTH AMENDMENT THE FOURTEEN AMENDMENT OF THE  
EQUAL PROTECTION DUE PROCESS TO THE U.S. CONSTITUTION

### (II) STATEMENT OF CLAIM 2

on the 23rd of October of 2021, an officer by the name of person arrived at Esterton's Me Ct, in Antioch a street but on the lift of Phillip McKinney in Antioch, upon his arrival officer person knocked at the door of my car which i did respond by opening the car, i could see the man in the car leave the battery to the car was out officer person asks me what was i doing in the car, reply that i used to live in 4112 Phillip Perry less than two blocks to the location where my vehicle was. officer person returns to his patrol car, in a short time he came back is me with the options neither leave the location with my car or he will car a tow truck to get the car from that location, this is after i told him that the battery to the car was down the car would start so there was no was i could have move the car and instead the car was already parked without blocking any residents entrance, or mailbox. The car was parked on the side of the road where i have been staying since i had arrived on the 19th of October of 2021 to the night the assault violation took place by officer person. After some reasoning with officer person denying him that he is in violation of my rights because i thought i might be parking law that could warrant my car being towed, and having i felt that this is a direct retaliation for my complaint of pending case against another officer, the police department, the sheriff's department, and officers from the sheriff's department officer person what about a car a tow truck him my car was towed and a 200 dollars ticket been issued to me. officer person violated my civil rights, and my constitutional rights to the fourteenth amendment to due process under the law. i did not commit any violation for when my car was towed by officer person, neither the ticket is freely was justifiable.

CLAIM OF STATEMENT 3

Defendant No. 6 Metro Nashville Davidson County Library System  
I have been a longtime member of the Metro library system with  
a membership card. Library Card. Card gives me the right to  
check out materials from the library system across Davidson  
County. Library in Antioch the South East library branch  
is the closest to me. I have been using this branch for the  
past two and half years. but sometime in October of  
2021 I was asked off the library premises by security  
guards on the instruction of management as I am able to  
understand later on. And this happened immediately after  
submitting three items to the County Law department in an  
Civil case involving me as Plaintiff the instructions by the  
Management of the library to the security guards to strip  
me from using the library premises may be Violation of  
statues County and City ordinances and official that  
received Federal funding from discriminatory discrimi-  
nations have on race, national origin, or other protected  
and me, and Federal law. One the library retaliated  
because I am denying me from the library retaliated  
the law is an active Civil action the County  
and County Police department, the Sheriff's department  
individual officials within their department  
Violations of Federal Law.

STATEMENT OF CLAIM 4

Defendant Metro Nashville Police Department, and  
Metro Nashville Davidson County Detention Center  
Sheriff Department and Metro Davidson County Library  
System, with General sessions Court each acted in  
Violation of my Civil and Constitutional Rights.  
The affirmation of both Plaintiff's Persons actions  
and that of the three Sheriff Officials that went to  
my house for the search on October 19 and Sheriff  
that both departments were not coming stand out  
accept responsibility for the actions of the officers  
for example, after the October 19 search, I reached out  
to the Sheriff's Department for the names of the three  
officials involved in the search the department did  
not provide with the information, just like in  
the other ongoing case. They did everything to stand  
behind the actions of the officers in the to the  
point of trying to cover up for them. This is what  
brought parties over paper defendant in this court  
for his father to properly press, and let the  
officials follow departmental protocols of a time when  
interacting with the public.  
Plaintiff further request that the three officials  
that went to the house on October 19 for the  
search to be considered witnesses in this complaint  
even though Plaintiff did not name them as such  
but for future discovery, and deposition purposes  
Plaintiff is reserving this request now so that he  
can't be compelled to provide an order for the disclosure of  
his officials during the course of the litigation.

#### IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Yes I sustained both emotional injuries, physical injuries, and other form of injuries including mental, pain and suffering due to Plaintiff Defendants actions. I visited the ER twice within the past two months due to an ongoing medical condition related to Defendants actions. My first ER visit was sometime in October due to cold and I was referred to the hospital you have before on 1st December due to swollen feet and swollen hills Medical Center

#### V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I'm refusing the amount of four hundred and sixty five million dollars for actual and punitive damages from defendants 1-2-3-4 and 6, and other damages for pain and suffering, medical bills, future medical bills, and other appropriate relief being within my the court. I also ask the court to vacate judgment entered against me by the General Sessions Court and an award of 3 million dollars for punitive and actual damages from defendant 5 and including pain and suffering in the amount of past and current

1) PLAINTIFF MAKES THE FOLLOWING DEMAND FOR  
RELIEF  
Four hundred and sixty thousand dollars from defendants  
Metro Nashville Police Department, Metro Nashville  
Sheriff Department, Metro General Sessions Court for  
Davidson County Nashville, TN Tennessee, Metro Library  
System Officer Percy in his official capacity  
Officer Person is must - this demands for  
relief in his official and individual capacity.  
Plaintiff also demands that the court award other  
damages as deem necessary and just to plaintiff  
apart of those arising for which include, punitive  
damages, actual damages, pain and suffering, intent  
infliction of emotional distress, medical bills, future  
medical bills lost of income from the time of the  
trial action of defendants till the end of this  
proceeding Plaintiff also demands that this court  
vacates the General sessions judgment award  
to Plaintiff former Comford Mr. Echigo, who is  
also a defendant - his for going proceedings.

Relief from Defendant (5) Echigo, OO Plaintiff  
demands the sum of three million four hundred  
and six thousand dollars from defendant  
number 5 for this sake - his conspiratory acts  
against Plaintiff for the following primitive  
damages, actual damages, pain and suffering,  
intentional infliction of emotional distress, medical bills  
future medical bill lost wages, from the time of the  
trial action till this time and till the end of this  
action. Plaintiff further requests that the judgment  
awards to him by the General sessions court to  
be vacated.

The actions of the Landlord, the Sheriff's General Sessions Court and Office person caused me tremendous pain and suffering from the 19th of October 2021 to the present moment this complaint is been file. After been evicted, I became homeless my car was my place of rest during the night after it got towed on the 23 of 2021 this not bad for me when I was left on the street between Andrews Grocery stores and restaurants had to keep warm, and keep going. The action is the the three Defendants caused me many other physical, emotional, and mental pain and suffering. For example from the 23 of October 2021 the night my car was towed I have been homeless, sleeping on the street in the open heat exposed to extreme cold weather which has led me to two ER visits within the past two months. Not only heat and cold weather I have also been exposed to other hazardous conditions like been at gas stations, and places with cigarette, I have been eating cereals sometimes, I have to walk miles every time it rains to go to the laundry mat to do laundry because my clothes can not be washed due to been outdoor living I have no place to stay when it rains I also have to eat from gas stations on the sides of the roads, on the steps of business premises this is all due to defendants actions in the many districts I have seen and searly towed my car for no reason, in the a lot of my gear in this action has came swollen feet pain and swelling. I went to the Hospital for treatment on both of my feet due to the policies defendants actions. Money is due to

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/20/2021



Signature of Plaintiff

Printed Name of Plaintiff

FRANCIS KESTER

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address